

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth.**

ORDER GRANTING FOUR HUNDRED THIRTY-FIFTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR  
WHICH THE COMMONWEALTH IS NOT LIABLE

Upon the *Four Hundred Thirty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for Which The Commonwealth Is Not Liable* [ECF No. 20490] (the “Four Hundred Thirty-Fifth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated April 1, 2022, for entry of an order disallowing in their certain claims filed against the Commonwealth, as more fully set forth in the Four Hundred Thirty-

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Thirty-Fifth Omnibus Objection.

Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Thirty-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Thirty-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; the claims identified in Exhibit A to the Four Hundred Thirty-Fifth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which the Commonwealth is not liable; and the Court having determined that the relief sought in the Four Hundred Thirty-Fifth Omnibus Objection is in the best interest of the Commonwealth and its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Thirty-Fifth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Thirty-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 20490 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Thirty-Fifth Omnibus Objection**

Four Hundred Thirty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	DIAZ RAMIREZ, LUIS RR 1 BOX 15057 MANATI, PR 00674	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	23026	\$ 3,458.00
	Reason: Proof of claim purports to assert liabilities associated with unpaid unemployment benefits from the Department of Labor (DOL). The books and records of the DOL, however, show that the claimant was deemed ineligible in 2016 and, upon appeal within the DOL, the DOL confirmed the claimant's ineligibility. Claimant did not appeal this decision and the claim and/or supporting documentation do not provide any further basis for asserting liability against the Commonwealth or any other Title III Debtor.					
2	FELICIANO ROSADO, MAIRA I CALLE ELENA SEGARRA #154 SECTOR EL MANI MAYAGUEZ, PR 00682	5/3/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	10547	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated the Commonwealth of Puerto Rico, but the claim and/or supporting documentation do not provide any basis for asserting liabilities against the Commonwealth of Puerto Rico or any other Title III Debtor.					
3	GOLDMAN SACHS BANK USA (F/K/A GOLDMAN SACHS CAPITAL MARKETS, L.P.) NICK VAN DUSEN(GOLDMAN SACHS BANK USA) 200 WEST STREET NEW YORK, NY 10282-2198	5/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	44253	\$ 3,606,830.47*
	Reason: Proof of Claim and supporting documentation assert liabilities associated with an interest rate swap agreement between the claimant and COFINA. Pursuant to the Amended Order and Judgment Confirming the Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation [ECF No. 5055] (the "COFINA Plan") and the Stipulation and Order with Respect to (A) Rejection of Swap Agreement Between Goldman Sachs Bank USA and Puerto Rico Sales Tax Financing Corporation, (B) Relief from Stay With Respect to Cash Collateral and (C) Allowance and Treatment of Claim [ECF No. 576, Case No. 17-3284], the claimant's agreement with COFINA was rejected and its claim against COFINA was treated pursuant to the COFINA Plan. Following confirmation of the COFINA Plan and approval of the settlement of the Commonwealth-COFINA Dispute, the claim and supporting documentation do not provide a basis for asserting liability against the Commonwealth of Puerto Rico.					
4	RODRÍGUEZ NÚÑEZ, JESSICA PO BOX 361191 SAN JUAN, PR 00936-1191	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	28239	\$ 1,000.00*
	Reason: Proof of claim purports to assert liabilities associated with a Commonwealth program for reimbursing minor damage to vehicles caused by roads. The books and records of the office of Services to the Citizen within the Puerto Rico Department of Transportation and Public Works (DTOP) show, however, that the claimant did not properly execute and file a claim form within the required statutory period in order to be eligible for payment, and the period to file a claim has elapsed. The claim and supporting documentation do not provide any further basis for asserting liability against the Commonwealth or any other Title III Debtor.					
5	SANTIAGO MEDINA, MILDRED 18 HOLLY STREET CARTERET, NJ 07008	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25574	\$ 830.00
	Reason: Claim to Be Disallowed purports to assert liability against the Commonwealth for commissions allegedly owed to claimant for the sale of insurance, but such liability would lie, if at all, with the claimant's employer, and not the Commonwealth.					
					TOTAL	\$ 3,612,118.47*